UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE)	Case No. 12-MD-2358 (SLR)
PLACEMENT CONSUMER PRIVACY)	
LITIGATION)	
)	
)	
)	
This Document Relates to:)	
ALL ACTIONS)	
)	

DECLARATION OF TAMMY M. STOKES IN SUPPORT OF CLASS COUNSEL'S APPLICATION FOR ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARDS

- I, Tammy M. Stokes, declare:
- 1. I am an attorney licensed to practice in Alabama and a partner at Guin Stokes & Evans LLC in Birmingham, Alabama. I am counsel to Representative Plaintiff Nicholas Heinrich. I make this declaration in support of Class Counsel's Motion for Attorneys' Fees, Expenses, and Incentive Awards ("Motion"). I make this declaration of my own personal knowledge and, if called to testify, I could and would competently testify hereto under oath.
- 2. Over the course of this litigation, I have coordinated with Class Counsel to communicate with my client, Representative Plaintiff Nicholas Heinrich. In so doing, my firm has spent 5.80 hours of time at hourly rates ranging between \$595 and \$735. I have practiced in Alabama for 18 years and, in my experience, these hourly rates fair and reasonable. I only performed work that was expressly requested and authorized by the Plaintiffs' Executive Committee, thereby ensuring that there was no duplication of efforts.
- 3. My firm keeps time records on a contemporaneous basis of the work performed. The total number of attorney hours spent by my firm is 5.80 and our total lodestar for those hours is \$3794.00. This lodestar figure is based on the ordinary professional billing rate that my law office charges in all complex cases such as this matter. Expenses are accounted for and billed separately and are not duplicated in our professional billing rate. Time expended in preparing this declaration was not included in this request. The time records for my firm are attached to this Declaration as **Exhibit A**.
- 4. My firm has incurred unreimbursed out-of-pocket expenses in the amount of \$56.15. These expenses were necessary and reasonably incurred in the prosecution of this case. The actual expenses incurred in the prosecution of this litigation are reflected on the accounting records of my firm. These accounting records are prepared from and based on receipts, check

records, and other source materials and represent accurate recordation of the expenses incurred.

The expense records for my firm are attached to this Declaration as Exhibit B.

5. I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed this 5th day of December, 2016 in Birmingham, Alabama.

GUIN STOKES & EVANS LLC

Tammy M. Stokes

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EXHIBIT A

IN RE GOOGLE INC. COOKIE PLACEMENT CONSUMER PRIVACY LITIGATION

Time Report and Lodestar Summary Firm Name: Guin, Stokes & Evans, LLC Reporting Period: 12/1/2015 through 6/30/16

Professional (Status)	Hourly								Current	Current
	Rate	1	2	3	4	5	6	7	Hours	Lodestar
Charles R. Watkins (OC)	\$735.00		1.30						1.30	\$955.50
David J. Guin (P)	\$710.00		0.30			1.10			1.40	\$994.00
Tammy M. Stokes (P)	\$595.00		1.90			1.20			3.10	\$1,844.50
									-	\$0.00
									-	\$0.00
									-	\$0.00
									-	\$0.00
									-	\$0.00
									-	\$0.00
									-	\$0.00
									-	\$0.00
TOTALS:		0.00	3.50	0.00	0.00	2.30	0.00	0.00	5.80	\$3,794.00

Categories:

- (1) Investigations, Factual Research
- (2) Discovery
- (3) Pleadings, Briefs, Pretrial Motions, Legal Research
- (4) Court Appearances
- (5) Settlement
- (6) Litigation Strategy, Analysis & Case Management
- (7) Class Certification

Professional Status:

- (P) Partner
- (OC) Of Counsel
- (A) Associate
- (SA) Staff Attorney
- (CA) Contract Attorney
- (LC) Law Clerk
- (PL) Paralegal
- (L) Librarian
- (I) Investigator
- (S) Seceretary

EXHIBIT B

IN RE GOOGLE INC. COOKIE PLACEMENT CONSUMER PRIVACY LITIGATION

Expense Report & Summary of Fees & Expenses Firm Name: Guin, Stokes & Evans, LLC Reporting Period: 12/1/2015 thru 6/30/16

	Current Total	
Assessments		
Commercial/Outside C	Copies	
Internal Photocopies/S	cans	
Court Fees (Filing Fees	s, etc.)	\$25.00
Court Reporter (Hearing	ng Transcripts)	
Deposition (Court Rep	orter, Videographer, etc.)	
Computer Research (L	\$8.20	
Telephone/Conference	Call Charges	
Postage	\$22.95	
Messenger		
Facsimiles		
Professional Fees (Exp	ert/Consultant, Investigator, etc.)	
Witness Fees		
Service of Process Fee	S	
Travel (Describe):		
	Meals	
	Flight	
	Hotel	
	Car Rental	
	Taxi	
	Total:	\$56.15